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Justice and Attorney General Kamala D. Harris*

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9 IN THE UNITED STATES DISTRICT COURT  
10 FOR THE NORTHERN DISTRICT OF CALIFORNIA

11 **MARK AARON HAYNIE, BRENDAN  
12 JOHN RICHARDS, THE CALGUNS  
13 FOUNDATION, INC., and THE SECOND  
AMENDMENT FOUNDATION, INC.,**

14 Plaintiffs,

15 v.

16 **KAMALA HARRIS, Attorney General of  
California (in her official capacity) and  
17 CALIFORNIA DEPARTMENT OF  
JUSTICE, CITY OF ROHNERT PARK,  
18 OFFICER DEAN BECKER (RP134), and  
DOES 1 TO 20,**

19 Defendants.

20 **BRENDAN JOHN RICHARDS, THE  
21 CALGUNS FOUNDATION, INC., and THE  
SECOND AMENDMENT FOUNDATION,  
INC. ,**

22 Plaintiffs,

23 v.

24 **KAMALA HARRIS, Attorney General of  
California (in her official capacity),  
25 CALIFORNIA DEPARTMENT OF  
JUSTICE, SONOMA COUNTY  
26 SHERIFF'S OFFICE, SHERIFF'S  
DEPUTY GREG MYERS (SD1023) and  
27 DOES 1 TO 20**

28 Defendants.

10-cv-1255-SI  
11-cv-2493 SI  
(Consolidated Cases)

**STIPULATION and JOINT  
ADMINISTRATIVE MOTION and  
PROPOSED ORDER  
Re: Case Management**

11-cv-5580 SI  
(Related Case)

**STIPULATION and JOINT  
ADMINISTRATIVE MOTION and  
PROPOSED ORDER  
Re: Case Management**

**MAX JOSEPH PLOG-HOROWITZ, THE  
CALGUNS FOUNDATION, INC., and THE  
SECOND AMENDMENT FOUNDATION,  
INC.,**

Plaintiffs,

v.

**KAMALA HARRIS, Attorney General of  
California, CALIFORNIA DEPARTMENT  
OF JUSTICE, COTATI POLICE  
DEPARTMENT, CITY OF COTATI,  
ANDREW LYSSAND (CO0339) and DOES  
1 TO 20,**

Defendants.

12-cv-00452 (LB)  
(Related Case)

**STIPULATION and JOINT  
ADMINISTRATIVE MOTION and  
PROPOSED ORDER  
Re: Case Management**

IT IS HEREBY STIPULATED<sup>1</sup> by and between the parties hereto through their respective attorneys of record that the pending Case Management Conference currently set for July 27, 2012 in Courtroom 10, 19th Floor of the U.S. District Court for the Northern District of California should be reset.

The Defendants in *Richards v. Harris I (Rohnert Park)*, Case No.: 3:11-CV-02493 SI have a motion to dismiss under submission that has been fully briefed and was argued on May 4, 2012. The parties believe that it would be a more productive use of the Court's time and resources to have the Case Management Conference after a ruling on the motion to dismiss has been issued.

Accordingly, the parties propose that the Court reset the Case Management Conference to some date after the Court anticipates releasing its order from the May 4, 2012 hearing.

For the convenience of the Court and its staff, Plaintiffs' counsel advises that he is unavailable on the following Fridays: August 10 and 17, September 27, and October 5, 2012.

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<sup>1</sup> *Haynie v. Harris*, Case No.: 3:10-CV-01255 SI was ordered consolidated with *Richards v. Harris*, Case No.: 3:11-CV-02493 SI, in an order filed on October 22, 2011. (See Documents # 42 and #15 respectively.) The second *Richards v. Harris*, Case No.: 3:11-CV-05580 was ordered to be related with the first two cases in an order filed on December 21, 2011. (See documents #47 and # 20 respectively.) The *Ploghorowitz v. Harris*, Case No.: 3:12-CV-0452 SI was ordered to be related on April 11, 2012. (See documents #32 and #20.)

**SO STIPULATED.**

Dated: July 19, 2012

/s/ Ross Moody

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Ross Moody  
Counsel for Defendants  
Harris & California Dept. of Justice

Dated: July 19, 2012

/s/ Donald Kilmer

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Donald Kilmer  
Counsel for Plaintiffs

Dated: July 19, 2012

/s/ Robert W. Henkels

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Robert W. Henkels  
Counsel for Defendants  
City of Rohnert Park & Becker  
Counsel for Defendants  
Cotati Police Department,  
City of Cotati, & Lyssand

**ATTESTATION FOR COMPLIANCE WITH GENERAL ORDER 45 AND LOCAL  
RULE VIII.B.**

I, Ross C. Moody, declare under penalty of perjury under the laws of California and the United States that I have in my possession e-mail correspondence from Donald Kilmer and Robert Henkels that the content of this document is acceptable to all persons required to sign the document. I declare that this document was signed in San Francisco, CA on July 19, 2012.

/s/ Ross Moody

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Ross Moody  
Deputy Attorney General  
Attorney for Defendants  
California Department of Justice and  
Attorney General Kamala D. Harris

**ORDER**

The Case Management Conference in these consolidated and related matters currently set for July 27, 2012 is reset to: (Date) \_\_\_\_\_, at (Time): \_\_\_\_\_, in Courtroom 10, 19th Floor of the U.S. District Court for the Northern District of California –

1 San Francisco. A Joint Case Management Conference Statement shall be filed seven (7) calendar  
2 days before the new date.

3 Date:

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5 United States District Judge

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